

Commonwealth of Kentucky
Division for Air Quality

RESPONSE TO COMMENTS

ON THE CONDITIONAL MAJOR DRAFT PERMIT F-06-044

Siegel-Robert Automotive, Inc.

350 Scotty's Way

Bowling Green, KY 42101

March 21, 2007

Rita Arguello, Reviewer

SOURCE ID: 021-227-00127

AGENCY INTEREST #: 4132

ACTIVITY ID: APE20060001

SOURCE DESCRIPTION:

Siegel-Robert Automotive (also known as S-R Kentucky), Inc. makes automotive grilles, handles and bathroom faucets. The source has applied for a Renewal of its Conditional Major permit that expired on May 7, 2006. Pursuant to 401 KAR 52:030, a Conditional Major permit (Permit No.: F-06-044) has been drafted for Siegel-Robert Automotive located at 350 Scotty's Way, Bowling Green, Warren County, Kentucky. The draft permit issued is a source wide conditional major permit which limits emissions of Particulate Matter (PM), Volatile Organic Compounds (VOC) and HAPs.

The Particulate matter (PM) is emitted from Surface Coating operations (paint spray booths) and has a fabric filter PM control unit that has 80% emission control.

The emissions resulting from the two (2) paint mask washer booths are negligible since these cleaning processes are described in AP-42 (p. 830) as having negligible emissions.

The only emissions from the grinding operation are Particulate Matter (PM) emissions. The size and nature of the grinding operation indicates that the grinding emissions are small. Therefore, the PM emissions from the grinders are considered negligible.

The two (2) plastic storage silos may emit PM during loading and/or unloading operations; however, the size and plastic pellet material indicates that the PM emissions, if any, are negligible.

PUBLIC AND U.S. EPA REVIEW:

On February 12, 2007, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *Bowling Green Daily News* in Bowling Green, Kentucky. The public comment period expired 30 days from the date of publication.

No comments were received during this period. The permit is now being issued final

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with

F-06-044 Renewal

applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.